

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| TEYO JOHNSON, | : |
| | : |
| Plaintiff, | : |
| | : |
| -against- | : Case No. 1:22-cv-06669(PAE)(GWG) |
| | : |
| EVERYREALM INC., COMPOUND ASSET | : |
| MANAGEMENT LLC, REALM METAVERSE | : DEFENDANTS EVERYREALM |
| REAL ESTATE INC., REPUBLIC, REPUBLIC | : INC., JULIA SCHWARTZ, |
| CRYPTO LLC, REPUBLIC REALM MANAGER | : WILLIAM KERR, AND JANINE |
| LLC, REPUBLIC REALM INC., REPUBLIC | : YORIO’S NOTICE OF MOTION |
| OPERATIONS LLC, OPENDEAL INC., | : TO DISMISS |
| OPENDEAL PORTAL LLC, JULIA | : |
| SCHWARTZ in her individual and professional | : |
| capacities, WILLIAM KERR in his individual and | : |
| professional capacities, and JANINE YORIO in | : |
| her individual and professional capacities. | : |
| | : |
| Defendants. | : |
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PLEASE TAKE NOTICE THAT Defendants Everyrealm Inc., Julia Schwartz, William Kerr, and Janine Yorio (collectively “the Everyrealm Defendants”) shall, upon Plaintiff Teyo Johnson’s (“Plaintiff”) First Amended Complaint; the Declaration of William Kerr, and the exhibits attached thereto; the Declaration of Janine Yorio, and the exhibits attached thereto; the Declaration of Lloyd B. Chinn, and the exhibit attached thereto; and the Everyrealm Defendants’ Memorandum of Law; all filed herewith, move this Court, at Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on such date and time as the Court may direct, for an Order pursuant to Federal Rule of Civil Procedure (“FRCP”) 12(b)(6) dismissing the Plaintiff’s sexual harassment claims against the Everyrealm Defendants because Plaintiff fails to state a claim upon which relief can be granted.

Dated: New York, New York
November 2, 2022

PROSKAUER ROSE LLP

By: /s/ Lloyd B. Chinn

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(f/k/a Republic Realm Inc.),
Julia Schwartz, William Kerr, and Janine Yorio